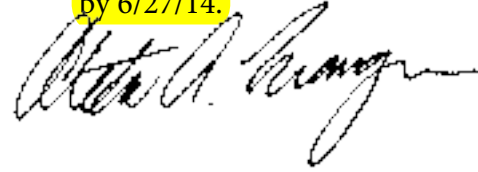


IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE

Motion GRANTED.  
Sur-reply to be filed  
by 6/27/14.



MAX DAEE AND TONI DAEE, )  
 )  
Plaintiffs )  
 )  
v. )  
 )  
JP MORGAN CHASE BANK, N.A., )  
 )  
Defendant )  
 )

Civil Action No. 3:13-cv-01332  
Judge Trauger  
Magistrate Judge Knowles

---

PLAINTIFFS' MOTION FOR LEAVE TO FILE SUR-REPLY TO DEFENDANT'S NEW  
GROUNDS FOR SUMMARY JUDGMENT CONTAINED IN DEFENDANT'S REPLY

---

Comes now the plaintiffs, Max and Toni Daee, and would respectfully move this Court to grant them leave to respond to the Defendant's new grounds for summary judgment contained in the Defendant's Reply, filed June 12, 2014. Specifically, in the reply, the Defendant raised a new grounds for summary judgment, that it is and holds the rights of a transferee, pursuant to Tenn. Code Ann. § 47-2-203, (Reply, Doc. 19, page 3) which it did not raise in its motion for summary judgment, filed May 21, 2014 (Motion, Doc. 15). Mr. and Mrs. Daee filed a memorandum of law in support of this motion which is attached.

Respectfully submitted,

/s/ Ernest Henry Neels, III  
Ernest Henry Neels, III / BPR # 030803